

BEFORE THE  
POSTAL REGULATORY COMMISSION

Periodic Reporting )  
(Proposal Four) ) Docket No. RM2016-12

**AMAZON FULFILLMENT SERVICES, INC.'S OPPOSITION  
TO MOTION OF UNITED PARCEL SERVICE, INC.  
FOR LEAVE TO FILE SUR-REPLY COMMENTS**

**(November 22, 2016)**

Amazon Fulfillment Services, Inc. (“AFSI”) respectfully submits this opposition to the November 21, 2016 motion of United Parcel Service, Inc. (“UPS”) for leave to file a sur-reply concerning AFSI’s November 14 reply and the T. Scott Thompson’s supporting declaration. AFSI’s reply responded directly to the comments and supporting declaration of Drs. Neels and Powers that were filed by UPS on October 17, and nothing in AFSI’s reply went beyond the scope of those comments and that declaration. As such, there is no need for a sur-reply and UPS has no basis for requesting leave to file one.

UPS’s contention that the results of the Neels-Powers simulation model were “intended only as an illustration of the Brattle Report’s critiques of the TRACS system” (Motion at 2) merely underscores the lack of any valid reason to reopen the record. There is no need to burden the record with one or more additional rounds of comments on a simulation exercise that is “only an illustration” and that “is in no way representative of UPS’s or The Brattle Group’s understanding of the actual Postal System.” *Id.*

Respectfully submitted,

/s/

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November 22, 2016